UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SRF-5J

Tuesday, 29 July 1997

Mr. J. P. Messier
Department of the Navy
Engineering Field Activities
Midwest Code 930
Naval Facilities Engineering Command, Bldg. 1-A
2703 Sheridan Road, Suite #120
Great Lakes, Illinois 60088-5600

Re: **Review of the Draft Quality Assurance Project Plan (QAPP) for the Remedial Investigation the Fire Fighting Training Unit (FFTU) - Naval Training Center, Great Lakes, Illinois.**

Dear Mr. Messier:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act and Executive Order 12088, the U.S. EPA has reviewed the above referenced document for the Naval Training Center, Great Lakes, Illinois. We reviewed the document to ensure that the QAPP would outline the Quality Assurance Objectives for measurement for the field work proposed at the Fire Fighting Training Unit (FFTU) facility would be identified.

U.S. EPA has the following comments which should be considered and addressed prior to proceeding with the analyses for the proposed sampling:

1) Due to the quick review time requested by the Navy, a Region V Quality Assurance Reviewer was unable to review this document. U.S. EPA has provided limited comments on this document that will assist the Navy in proceeding with its project. As this is a federal facility lead site, the Navy is responsible for the Quality Assurance and Quality Control of the work performed on site as well as the analytical results from this work. U.S. EPA takes this responsibility when they are the lead agency. In reviewing

the signature page, the Navy Project Manager should be listed. U.S. EPA will submit a letter concerning whether or not substantive comments have been addressed in the revision of this document. Our response letter will serve to document whether the revisions to the document were acceptable rather than this signature page.

2) Page 4 of 11, Section 1.4.1 - The rationale for eliminating the Target Analyte List should be provided. The applicability of referencing TACO is inappropriate for CERCLA type of investigations. In addition, U.S. EPA understood that the TAL metals list which were analyzed during the initial characterization would be narrowed down to the eight metals analyzed for the Resource Conservation and Recovery Act (RCRA) based upon comparison to U.S. EPA Region IX's Preliminary Remediation Goals (PRGs). Was this a misunderstanding?

Also, when closure sampling is conducted, the full TAL list will be required and analytical results shall be subsequently compared to U.S. EPA Region IX's PRGs to maintain consistency. Some provision in this document may be necessary to specify the data quality objectives for these analyses.

3) Page 7 of 11, Section 1.5, Paragraphs 1 and 2 - How will it be determined whether contamination is associated with general historical land use, product and waste storage and uncontrolled waste management practices or whether contamination is associated with fuel oil and combustion of petroleum?

4) Page 8 of 11, Section 1.5, second bullet - Will the groundwater samples taken upgradient, downgradient and from areas suspected of contamination be from temporary monitoring locations, monitoring wells or exposed groundwater found in excavated areas? Is this described in the FSP? If so, please reference this document and the section(s).

5) Page 9 of 11, Section 1.5.2 - The fourth sentence in this section is somewhat misleading. In the event that analytical results are to be used to conduct the baseline risk assessment, this risk assessment will be evaluated in terms of whether the potential contaminant of concern present a cancer risk or a noncancer risk to human health and the environment. Please clarify intended data usages.

6) Table 1-6, Intended Data Usage - The initial characterization sampling included TAL analyses. This is not noted in the parameters column. Also the intended data usage of this data should be specified.

It should be noted that this table is incomplete for Grab Samples during trenching and excavating activities and the Remedial Investigation the parameters are not designated. In addition, if the intended data usage for this is different, this needs to be identified.

7) Table 1-7, Summary Table of Sampling and Analysis Program - As the initial characterization focused on soils, surface water and sediment were not characterized. The full TAL list is recommended for initial characterization of these media.

8) Table 1-8, Rationale for Sample Locations - The category indicates that both TCL/TAL analyses will be conducted. This is inconsistent with the text and other tables. A thorough check of this in coordination with our other comments on this document should be taken into consideration in the revision.

The rationale for the number of samples and location should include the dimensions of the area or compartment as well as information pertaining to why the number of samples are proposed. For example, if there is a trench it is logical to take a sample on the bottom and the side walls.

9) Table 1-9, Data Quality Objectives Process - How was it determined that 95% laboratory analysis and 90% field measurements will meet the DQOs? If the DQOs are not met, will additional sampling occur at no additional cost to the Navy?

10) Page 2 of 8, Section 2.2, Beling Project Manager - As the Project Manager is under the direction of the Navy, ensuring that the project meets U.S. EPA's objectives is inappropriate. The project should meet the Navy's quality standards and objectives for fulfilling their legal and regulatory requirements.

11) Page 3 of 8, Section 2.3, US EPA Region V Superfund Division Quality Assurance Reviewer - See comment #1.

12) Page 4 of 8, Section 2.4, On-Site Laboratory Manager - Will samples run at the mobile laboratory meet the same data quality objectives of those that are sent to an off-site laboratory? Is this just for the BioPile analyses?

13) Page 5 of 8, Section 2.5, Laboratory Responsibilities - Who will be responsible for identifying problems at ARDL level and its potential inability to meet requirements of the project specific QAPP and discuss and document resolutions with the laboratory technicians and Project Manager?

14) Page 2 of 5, Section 3.3, Completeness - How were the percentage for field and laboratory completeness objectives determined? What occurs if these objectives are not met?

15) Table 3-5, QA Objectives for Field Measurements - Please indicate the source for the precision specification or Note 2 on Page 2 of 2.

16) Table 3-6, QA Objective s for Laboratory Parameters - Please cite the source of this table.

17) Page 1 of 2, Section 4 - What is the RS/RI work plan which is referred to in the first paragraph?

18) Table 4-1, Sample Container, Preservation and Holding Time Requirements - Please cite the source of this table.

19) Page 4 of 4, Section 5.3 - The final evidence file will include any variance or deviation reports implemented by the laboratory/ field personnel, etc.

20) Page 1 of 1, Section 7.1.2 - Herbices should be herbicides. Please correct.

21) Page 4 of 5, Section 9.3.2 - It is unclear whether the task to report laboratory data to the U.S. EPA is applicable. As this project is being conducted by the Navy, the Navy shall be responsible for the quality of the data. This is related to comment #1.

22) Table 11-1 - GPC Frequency states every 1500 - 200 hours of use. Please clarify. Also, cite the source for this table. Is it a compilation of manufacturer's specifications?

22) Table 11-2 - Cite the source for this table. Is it a compilation of manufacturer's specifications?

23) Page 1 of 4, Section 13 - It is unclear as to whether U.S. EPA will be responsible for issuing a nonconformance report is applicable. As this project is being conducted by the Navy, the Navy shall be responsible for the quality of the data. This is related to comment #1.

24) Appendix A - This section is deficient. There is very little information on environmental sampling depending upon the media which is to be sampled. What procedures will be followed for sample collection and handling? How will VOC samples be collected in the various media? In what order will groundwater samples be taken from direct push sampling points? How will the groundwater level measurements be taken? Please describe the process for lithologic sampling. What classification system will be used?

Please describe the process for logging unconsolidated materials consolidated materials and what information which will be recorded.

Page 5 of 10, Section 4.3 - The log book should also note the the date and time of activity, location of samples in relation to easily identifiable landmark using a tape and compass, identity and calibration of field instruments, the depth at which saturated

conditions were encountered, identity of people and subcontractors performing activites. Also, how was it determined that areas where PID readings exceeding 50ppm would be noted?

Page 7 of 10, Section 7.0 - For equipment decontamination, there is no mention for how the euipment will be cleaned if oily waste is present.

Page 7 of 10, Section 8.2 - How was it determined that the screen would be five feet in length with 0.01 inch slot screens?

Page 9 of 10, Section 8.4 - If the tubing is oscillated up and down, will this process inadvertently volatilize potential contaminants of concern?

Page 10 of 10, Section 15 - To dispose of IDW into on-site holding tanks for treatment in the BioPile may require RCRA permitting. This may also be a requirement of the BioPile itself. Has this been researched?

Thank you for the opportunity to provide comments on these documents. If you have any questions, please contact me: (312) 886-0850.

Sincerely,

Laura J. Ripley
Federal Facilities Project Manager

cc: Donald Harrison, IEPA
Molly Arp, Beling Consultants (fax only)
Section File